

**LAW OFFICES OF THE
COCHISE COUNTY PUBLIC DEFENDER
P.O. BOX 1856
BISBEE, AZ 85603
State Bar Record # 00000500
Tel.: (520) 432-8440
Fax: (520) 432-8478
Email: pdmeo@cochise.az.gov**

Kai M. Henderson
Deputy Public Defender
Attorney for Defendant

IN THE JUSTICE COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF COCHISE
Justice Court #5

 COPY

STATE OF ARIZONA,)	No.	CR2018-01020/1387
Plaintiff,)		CR2019-0091
v.)		Stipulated Motion to Modify Conditions of
SAMANTHA MARIE IRENE CHILDS,)		Release
Defendant.)		(Hon. Patrick Call)
)		(Expedited Ruling Requested)

The Parties, by and through undersigned counsel, hereby move this Court to modify the Defendant's conditions of release to be released on her own recognizance.

Ms. Childs has reached an agreement with the State to allow her to be released on her own recognizance. Her conditions of release currently allow her to reside at Graceland. Ms. Childs and the State have a tentative agreement to allow her to be released for 30 days pending her sentencing on her felony cases. To effectuate this agreement the Defendant must be released OR in the above captioned cases. An expedited ruling is requested as the deal was recently struck and a change of plea hearing is set for Monday September 9th at 8:30 a.m. at which time it is expected that the Superior Court will modify her conditions of release.

WHEREFORE, the parties respectfully request that this Court release Ms. Childs on her own recognizance.

RESPECTFULLY SUBMITTED this September 6th, 2019.

RICHARD G. KARWACZKA
COCHISE COUNTY PUBLIC DEFENDER

By 
Kai M. Henderson
Deputy Public Defender

Copy of the foregoing delivered this
6th day of September, 2019 to:

Hon. Patrick Call
Justice of the Peace
via inter-office mail

Tiffani Wickel
Deputy County Attorney
Bisbee, AZ 85603
via inter-office mail

SAMANTHA MARIE IRENE CHILDS

By: 